

**IN THE DISTRICT COURT OF WAGONER COUNTY
STATE OF OKLAHOMA**

WAGONER COUNTY, OKLAHOMA
FILED
IN DISTRICT COURT

JAMES CRANE,

Plaintiff,

vs.

**DOLGENCORP, LLC d/b/a
DOLLAR GENERAL.**

Defendant.

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JUN 17 2021

JAMES E. HIGHT
COURT CLERK

Case No. C J - 2021 - 0149

PETITION

COMES NOW, the Plaintiff, James Crane, by and through his attorney, John M. Thetford of Levinson, Smith and Huffman, PC, and for his cause of action against the Defendant, Dolgencorp, LLC, d/b/a Dollar General ("DG") alleges and states as follows:

1. That the Defendant, DG, is a foreign corporation with a registered agent listed as the Corporation Service Company at 10300 Greenbriar Place, Oklahoma City, OK 73159.
2. That the Defendant, DG, is duly authorized and doing business in Wagoner County, State of Oklahoma.
3. All of the events giving rise to this cause of action, arose in Wagoner County, State of Oklahoma.
4. On August 19, 2019, Mr. Crane was shopping at Defendant, DG's store located at 13695 S. State Highway 51, Coweta, Oklahoma.
5. Mr. Crane fell when he stepped on to an abnormally steep declining section of the DG parking lot that had multiple cracks and defects.
6. The parking lot was defective in multiple respects.

7. The area which caused Mr. Crane's fall was cracked, weathered and in total disrepair.

7. In addition to the multiple defects, the parking lot in the area of the fall had an abnormally steep grade which made the parking lot abnormally dangerous to the DG customers.

6. DG and its employees failed to maintain the subject premises in a safe and suitable manner to prevent and/or eliminate the risk of falls.

8. Said neglect caused Mr. Crane's fall.

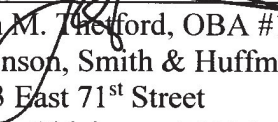
9. Mr. Crane sustained significant injuries to his body and mind as a direct result.

10. This violated the duty owed to Mr. Crane and other patrons visiting the subject store.

11. As a result of Defendant's breach of duty owed to Mr. Crane, and his resulting injuries, Mr. Crane is entitled to damages in a sum in excess of \$75,000.00.

WHEREFORE, premises considered, Plaintiff respectfully requests this Court enter judgment in a sum in excess of \$75,000.00 along with attorney fees and cost and any other such further relief as the Court deems just and reasonable.

Respectfully submitted,



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